

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

EVDOKIA NIKOLOVA,  
*Plaintiff,*

v.

UNIVERSITY OF TEXAS AT AUSTIN,  
*Defendant.*

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Civil Action No.: 1:19-CV-00877

**DEFENDANT’S OBJECTIONS TO PLAINTIFF’S EXHIBITS**  
**PRESENTED IN PLAINTIFF’S SECOND AMENDED EXHIBIT LIST**

Defendant The University of Texas at Austin hereby respectfully offers its objections to Plaintiff’s exhibits as presented in Plaintiff’s Second Amended Exhibit List.

No.	Description	Expect To Offer	May Offer	Defendant UT Austin’s Objection(s) & Grounds
1.	Dean’s Assessment, UT 22-25	X		• No objection.
2.	Rebuttal to Dean’s Assess, UT 6-20	X		• Hearsay (Fed. R. Evid. 802).
3.	Change in Academic Rank Summary Form EN, UT 21	X		• No objection.
4.	Chair’s Letter of Support, UT 26-30	X		• No objection.
5.	Budget Council Teaching, UT 58-61	X		• No objection.
6.	Teaching Statement, UT 62-68	X		• No objection.
7.	Budget Council Research, UT 77-80	X		• No objection.
8.	Research Statement and Supporting Docs, UT 81-91	X		• No objection.
9.	Budget Council Service, UT 96-97		X	• No objection.

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
10.	Nikolova CV, UT 34-57	X		• No objection.
11.	External Letters All, UT 220-21, 224-26, 228-229, 231-232, 235-36, 239-41, 244-45, 248-49, 252-53	X		• No objection.
12.	Letter Atamturk Berkley, UT 220-21		X	• No objection.
13.	Letter Conitzer Duke, UT 224-26		X	• No objection.
14.	Letter Goel Stanford, UT 228-229		X	• No objection.
15.	Letter Jaillet MIT, UT 231-232	X		• No objection.
16.	Letter Kannan U Penn, UT 235-36		X	• No objection.
17.	Letter Schulz U Munich, UT 239-41	X		• No objection.
18.	Letter Shmoys Cornell, UT 244-45	X		• No objection.
19.	Letter Van Hentenryck Ga. Tech, UT 248-49	X		• No objection.
20.	Letter Yannakakis Columbia, UT 252-53		X	• No objection.
21.	Peer Teaching Evals, UT 69-74		X	• No objection.
22.	Tenure Dossier Full Nikolova, UT 16304-16429 ( <del>UT 1-146</del> ) (Changed per Defendant's objection).		X	• No objection. • (Prior objection withdrawn due to Plaintiff's change.)
23.	Blum Letter, UT 26177-179	X		• No objection.
24.	Erez Letter Discrim, UT 8814	X		• No objection.

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
25.	EM Letter urging the positive conclusion of Dr Evdokia Nikolovas tenure appeal, 4.8.19, UT 8773-75	X		• No objection.
26.	EM Letter urging the positive conclusion of Dr Evdokia Nikolovas tenure appeal, 4.9.19, UT 9737-40	X		• No objection.
27.	P&T Committee Notes Em, UT 7550		X	• No objection.
28.	P&T Committee Notes, UT 7551-54	X		• No objection.
29.	Pres Cmtee Chart, UT 8749		X	• No objection.
30.	Nikolova Denial Letter, UT 660	X		• No objection.
31.	EM Nikolova Final Arguments letter, UT 7906- 07	X		• No objection.
32.	Request for Reconsideration/Final Arguments Letter, UT 256-76, 8078-8139 (Appendix added.)	X		• Hearsay (Fed. R. Evid. 403).
33.	CCAFR Appeal, UT 616-695	X		• Hearsay (Fed. R. Evid. 403).
34.	CCAFR Decision, UT 696-713	X		• No objection.
35.	CCAFR Pres Response, UT 714-718	X		• No objection.
36.	CCAFR To Dukerick, UT 8834-8836		X	• No objection.
37.	Hiring Letter EN, P 1935-38	X		• No objection.
38.	EM FW Offer JS-GF 8670		X	• No objection.

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
39.	Chair Letter of Support Initial, UT 19042-46		X	<ul style="list-style-type: none"> <li>No objection.</li> </ul>
40.	Faculty w MID, UT 36126-27	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
41.	Pregnancy Extension MID 2015 EN, UT 7053- 57	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
42.	MID 2018 EN, P 1872-73	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
43.	Tiwari Rescinding Docs, UT 26881-85, 34014-16, 26,886	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
44.	EM all 2019 update AT to EN, P 1902	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
45.	EM [cse-ece-faculty] Congratulations AT-EEF, UT 25675	X		<ul style="list-style-type: none"> <li>Relevance (Fed. R. Evid. 401).</li> <li>Note 1: UT Austin willing to stipulate to child's birthdate and contemporary announcement to ECE faculty.</li> <li>Note 2: Exhibit has a minor's name; if admitted over UT Austin's objection, Plaintiff may want to redact.</li> </ul>
46.	EM Fwd Baby Elitza, KL-SS&AT, UT 25628-37	X		<ul style="list-style-type: none"> <li>Relevance (Fed. R. Evid. 401).</li> <li>Unfair prejudice (Fed. R. Evid. 403).</li> <li>Note 1: UT Austin willing to stipulate to child's birthdate and contemporary announcement to ECE faculty.</li> <li>Note 2: Exhibit has a minor's name; if admitted over UT Austin's objection, Plaintiff may want to redact.</li> </ul>
47.	EM RE Ask about tenure clock extension, EN- AT, UT 18882	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
48.	EM Congratulations! AT-EM, P 3783	X		<ul style="list-style-type: none"> <li>Relevance (Fed. R. Evid. 401).</li> <li>Unfair prejudice (Fed. R. Evid. 403).</li> <li>Note: UT Austin willing to stipulate to child's birthdate and contemporary announcement to ECE faculty.</li> </ul>

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
49.	EM "Consultative Committee for the Next Department Chair" EN to SW, P 1867-71	X		<ul style="list-style-type: none"> <li>Relevance (Fed. R. Evid. 401)</li> </ul>
50.	EM [cse-ece-faculty] Occupying the EERC SW-EN, P 2869-73		X	<ul style="list-style-type: none"> <li>Relevance (Fed. R. Evid. 401)</li> <li>Confusing the issues (Fed. R. Evid. 403)</li> </ul>
51.	Faculty Council Mtg Transc 2019, UT 24936- 53	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
52.	Faculty Council Minutes 2019, UT 24928-34	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
53.	Roadshow Agenda Spring 15, UT 34023		X	<ul style="list-style-type: none"> <li>No objection.</li> </ul>
54.	Roadshow Agenda Spring 16, UT 34024		X	<ul style="list-style-type: none"> <li>No objection.</li> </ul>
55.	Roadshow Agenda Spring 17, UT 34025		X	<ul style="list-style-type: none"> <li>No objection.</li> </ul>
56.	Roadshow Agenda Spring 18, UT 34026		X	<ul style="list-style-type: none"> <li>No objection.</li> </ul>
57.	Roadshow Agenda Spring 19, UT 34027		X	<ul style="list-style-type: none"> <li>No objection.</li> </ul>
58.	Annual Report Standing Committees General Faculty 18-19, UT <del>6921-6972 (UT 6873-6920)</del>	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
59.	General Tenure Guidelines 2018-19, UT 735-55	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
60.	HOP 2-2010, UT 762-63	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
61.	HOP 2-2020, UT 764-765	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
62.	HOP 2-2160 UT 774-76	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
63.	HOP 2-2240 MID, UT 780-81			<ul style="list-style-type: none"> <li>No objection.</li> </ul>

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
64.	HOP 3-3020 Nondiscrimination, Dalton Depo Ex 60	X		• No objection.
65.	HOP 3-3031 Prohibition of Sex Discrimination, Dalton Depo Ex 61	X		• No objection.
66.	Regents Rule 10701, Dalton Depo Ex 62	X		• No objection.
67.	Training scenarios, UT 2234-35		X	• Relevance (Fed. R. Evid. 401).
68.	Responsible Employee Resource Guide, UT 2228-29	X		• Relevance (Fed. R. Evid. 401). • Confusing the Issues, Wasting Time (Fed. R. Evid. 403).
69.	Women in Engineering Title IX, UT 2764-87		X	• Relevance (Fed. R. Evid. 401). • Confusing the Issues, Wasting Time (Fed. R. Evid. 403).
70.	Title IX and Non- Discrimination, UT 4995- 5034		X	• Relevance (Fed. R. Evid. 401). • Confusing the Issues, Wasting Time (Fed. R. Evid. 403).
71.	EM Faculty Interview Etiquette, P 1885-87		X	• Relevance (Fed. R. Evid. 401). • Confusing the Issues, Wasting Time (Fed. R. Evid. 403).
72.	EM FW Title IX: Pregnant or Parenting?, P 1888-91		X	• Relevance (Fed. R. Evid. 401). • Confusing the Issues, Wasting Time (Fed. R. Evid. 403).
73.	Broadening Participation in Computing Plan, P 1925-28		X	• Relevance (Fed. R. Evid. 401) . • Confusing the Issues, Wasting Time (Fed. R. Evid. 403). • Authentication, Lack of Foundation (Fed. R. Evid. 901).
74.	EM another question BE-EN, P 1894-95	X		• Relevance (Fed. R. Evid. 401) • Confusing the Issues, Wasting Time (Fed. R. Evid. 403).
75.	College of Natural Science Faculty Handbook, P 2769-73	X		• No objection.

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
76.	Interview of Sharon Wood, <a href="https://www.hartenergy.com/exclusives/2020-pinnacle-award-winner-dr-sharon-l-wood-university-texas-186588">https://www.hartenergy.com/exclusives/2020-pinnacle-award-winner-dr-sharon-l-wood-university-texas-186588</a> (Wood Depo Ex 5)	X		<ul style="list-style-type: none"> <li>Original objection:               <ul style="list-style-type: none"> <li>Relevance (Fed. R. Evid. 401)</li> <li>Unfairly Prejudicial, Wasting Time (Fed. R. Evid. 403).</li> </ul> </li> <li>Defendant has agreed to withdraw this objection on the condition that Plaintiff play the clip in its entirety from start-to-finish and not merely an excerpt at a specific timestamp.</li> </ul>
77.	EM Re chaired professorship at Duke, EN-AT, UT 18691-93	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
78.	EM Your AitF Proposal, EN-AT, UT 17801-17804	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
79.	EM Promotion AT to EN, P 1983-85	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
80.	EM Evdokia 3rd year review AD-AT, UT 19100	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
81.	EM Third year review AT-EN, P 2428-33	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
<del>82.</del>	<del>Third Year Review EN, UT 8657-59</del> (Withdrawn)			N/A.
83.	EM my teaching evaluations for 360C AT-EN, P 1990-2006	X		<ul style="list-style-type: none"> <li>Relevance (Fed. R. Evid. 401).</li> <li>Hearsay (Fed. R. Evid. 802).</li> </ul>
84.	EM Teaching evals for 360C EN-BE, P 2007-08	X		<ul style="list-style-type: none"> <li>Relevance (Fed. R. Evid. 401).</li> </ul>
<del>85.</del>	<del>EM teaching data EN-SS, P 2092-93</del> (Withdrawn)			N/A.
<del>86.</del>	<del>CIS Percentiles, P004382</del> (Withdrawn)			N/A.
<del>87.</del>	<del>ECE CIS Score Percentiles, P004383</del> (Withdrawn)			N/A.

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
88.	EM data on teaching EN-SS, P 2102-06 (Withdrawing pgs 2107-2110)	X		• No objection.
89.	EM promotion vote, AT-EN, UT 19109-11	X		• No objection.
90.	<del>EM Promotion AT-EN, P 1983-85</del> (Withdrawn)			N/A.
91.	EM Good morning everyone! JB-EN, P 2191- 93		X	• No objection.
92.	EM 2018 CV & Publication List JB-DA, P 2279-82		X	• No objection.
93.	EM CV attached JD-EN, P 2287-99		X	• No objection. • Note: Exhibit has students' names; to avoid FERPA concerns, the names should be redacted prior to admission.
94.	EM Teaching statement attached EN-SS, P 2309-14	X		• No objection.
95.	EM Help with tenure Teaching Statement EN- CJ, P 2327-32	X		• No objection.
96.	EM remaining documents EN-JB, P 2372-76	X		• No objection. • Note: Exhibit may have students names; to avoid FERPA concerns, the names should be redacted prior to admission.
97.	Sample Teaching Statement Vijay Reddi, P 2253-55	X		• Relevance (Fed. R. Evid. 401). • Authentication, Lack of Foundation (Fed. R. Evid. 901).
98.	EM Teaching Statement edit JB-EN, P 2551-56	X		• Relevance (Fed. R. Evid. 401)
99.	EM promotion vote 09.12.18, AT-EN, UT 19028-29	X		• No objection.



No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
100.	EM Re EE 360C required for which students, JV-EN, CJ, & VV, UT 6227-28	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
101.	EM Comments on Nikolova SW-SS, UT 33877-78	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
102.	EM Re question for ECE chair, AT-GS, UT 7472-73	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
103.	EM FW question for ECE chair, GS-SW, UT 7476-77	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
<del>104.</del>	<del>EM FW question for ECE chair JS-SW UT 7476-77 (Withdrawn)</del>			N/A.
<del>105.</del>	<del>EM FW question for ECE chair, GS-SDS, UT 26165 (Withdrawn)</del>			N/A.
106.	EM RE question for ECE chair, SW-GS, UT 37789-90	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
107.	EM Fwd: further thoughts EN-EN, P 4334-45		X	<ul style="list-style-type: none"> <li>Relevance (Fed. R. Evid. 401).</li> <li>Hearsay (Fed. R. Evid. 802).</li> </ul>
108.	EM Re rebuttal draft, EN-AT, UT 26013-14		X	<ul style="list-style-type: none"> <li>No objection.</li> </ul>
109.	TXT Between EN-AT P 2759-67		X	<ul style="list-style-type: none"> <li>No objection.</li> <li>Note: Exhibit has a minor's name; if admitted over UT Austin's objection, Plaintiff may want to redact.</li> </ul>
110.	EM RE P&T Decision, AT-EN, UT 18998-19001	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
111.	EM RE question for ECE chair, SW-AT, UT 25607-09	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
112.	EM RE [cse-ece-faculty] P&T decision, AT-JL, UT 18992-95	X		• Relevance (Fed. R. Evid. 401).
113.	EM update from conversation with Carmen, EN-EB&AT, UT 8622	X		• No objection.
114.	EM Re confidential Petition, SW-AT, UT 19569-71	X		• No objection.
115.	EM confidential: Petition JS-SW, UT 7692-94		X	• No objection.
116.	EM Re Petition, AT-SS, UT 19004-05		X	• No objection.
117.	EM Re: Petition SS-EN, P 4319-21		X	• No objection.
118.	TXT Texts btwn SS and EN, P 4365-74		X	• No objection.
119.	EM Fwd Promotion of Assistant Professor Evdokia Nikolova to Associate Professor with tenure, AT-SS, UT 19010-11	X		• No objection.
120.	EM Fwd P&T decision EN-ECE Faculty, P 4474-4713	X		• No objection.
121.	EM Fwd: P&T decision EN-ECE Faculty, P 2637-41, P 2618-21	X		• No objection.
122.	EM RE [cse-ece-faculty] P&T decision, SW-GS&AT, UT 7943-51	X		• No objection.
123.	EM Re <a href="mailto:nikolova2009@gmail.com">[nikolova2009@gmail.com]</a> Re [cse- ece-faculty' P&T decision, AT-YP, UT 18948- 56	X		• No objection.

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
124.	EM RE [cse-ece-faculty] P&T decision, AT- DW, UT 18969-72	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
125.	EM RE [cse-ece-faculty] P&T decision, GS- AT, UT 19936-42		X	<ul style="list-style-type: none"> <li>No objection.</li> </ul>
126.	Female Promote CSE ECE, UT Austin 7660 (Changed per Defendant's objection.)		X	<ul style="list-style-type: none"> <li>No objection.</li> <li>(Prior objection withdrawn based on Plaintiff's change.)</li> </ul>
<del>127.</del>	<del>EM Re [ece-faculty-a] Promotion statistics, AT-YP, UT 19012-16 (Withdrawn)</del>			N/A.
128.	EM RE Key questions, AT-JA, UT 18968	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
129.	EM RE [cse-ece-faculty] P&T decision, AT- GS, UT 18961-67			<ul style="list-style-type: none"> <li>No objection.</li> </ul>
130.	EM comparison with Zoya Heidari from Petroleum Engineering, EN-AT, UT 8385-87	X		<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
131.	Tewfik Text Re Email, P 4384	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
132.	EM Plan to submit Final Arguments and CCAFR appeal later today EN-CS, P 4389-91	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
133.	EM RE CCAFR Report on Dr. Evdokia Nikolova, SW-GS, UT 7973-74	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
134.	EM RE CCAFR Reposrt on Dr. Evdokia Nikolova 04.30.19, SW-GS, UT 7975-76	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
135.	EM Most controversial case, SW-DD, UT 7965	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
136.	EM RE Procedural tenure question, SW-CS&GS, UT 7928-30	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
137.	EM Re [cse-ece-faculty] P&T decision, SW- JD, UT 7915-19		X	<ul style="list-style-type: none"> <li>No objection.</li> </ul>
138.	EM Re update, JD-SW, UT 7879-81		X	<ul style="list-style-type: none"> <li>No objection.</li> </ul>
139.	EE360 CIS Results, P004390-P004473 (Also in part P's MSJ Response Ex 35)		X	<ul style="list-style-type: none"> <li>No objection.</li> </ul>
140.	EE 319 CIS Results, Ex 41, P's MSJ Response		X	<ul style="list-style-type: none"> <li>No objection.</li> </ul>
141.	CIS Individual Results, P 2874-3071		X	<ul style="list-style-type: none"> <li>No objection.</li> </ul>
142.	Heidari Dossier Docs, UT 16915-18, 17025-28	X		<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
143.	Heidari Dossier Full, UT 16914-17116		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>

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144.	Belkin Dossier Docs, UT 22432-35	X		<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
145.	Belkin Dossier Full, UT 22432-22573		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
146.	Tiwari Dossier Docs, UT 16430-33, 16456, 16464-68, 16474, 16462, 16452-53, 16463	X		<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
147.	Tiwari Dossier Full, UT 16430-563		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
148.	Foster Dossier Docs, UT 13843-50, 13883	X		<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has overruled the objections (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
149.	Foster Dossier Full, UT 13843-14001		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
150.	Cox Dossier Docs, UT 11042-46, 11080, 11120-21, 11150-52	X		<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
151.	Cox Dossier Full, UT 11042-11224		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
152.	Saleh Dossier Docs, UT 14143-47, 14176, 14197, 14215-17	X		<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
153.	Saleh Dossier Full, UT 14143-14280		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
154.	Okuno Dossier Docs, UT 14627-31, 14656, 14696-97	X		<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
155.	Okuno Dossier Full, UT 14627-14785		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
156.	Salamone Dossier Docs, UT 14786-79, 14817-14818, 14861-62	X		<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
157.	Salamone Dossier Full, UT 14786-14913		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
158.	Yeh Dossier Docs, UT 15089-92, 15118, 15157	X		<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
159.	Yeh Dossier Full, UT 15089-15249		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
160.	Sun Dossier Docs, UT 14281-85, 14303, 14338, 14367-69	X		<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
161.	Sun Dossier Full, UT 14281-14440		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
162.	Reddi Dossier Docs, UT 17117-21, 17161, 17184-88	X		<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
163.	Reddi Dossier Full, UT 17117-17253		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>



No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
164.	Dimikas Dossier Docs, UT 16761-64, 16848-50	X		<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
165.	Dimikas Dossier Full, UT 16761-16913		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
166.	Humphreys Dossier Docs, UT 11760-64, 11803, 11870-71	X		<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
167.	Humphreys Dossier Full, UT 11760-11944		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
168.	El Mohtar Dossier Docs, UT 11225-11229, 11255, 11289-91, 11296, 11334-35	X		<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
169.	El Mohtar Dossier Full, UT 11225-11401		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
170.	Bickel Dossier Docs, UT 22913-22916, 22968-71, 23007	X		<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
171.	Bickel Dossier Full, UT 22913-23080		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
172.	Gerstlauer Dossier Docs, P 464-67, 509, 524-27, 566	X		<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
173.	Gerstlauer Dossier Full, UT 26888-27054		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
174.	Zoldan Dossier Full, UT 24757-24927	X		<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
175.	Heidari Offer Letter, UT 33888		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
176.	EM RE Official Offer Letter JO-ZH, UT 33892-94		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
177.	EM draft letter JO-ZH, UT 33895		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
178.	EM FW start-up list JO-ZH, UT 33900-02		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
179.	EM PGE hiring proposal JO-SW, UT 33908-09		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
180.	EM Zoya offer JO-GS, UT 34001		X	<ul style="list-style-type: none"> <li>Without waiving its prior objections (as presented in Dkt. #69), Defendant recognizes the Court has already overruled its objections to this exhibit (Dkt. #74). To the extent necessary to preserve the issue, Defendant respectfully re-urges its objections as previously presented.</li> </ul>
181.	EM Re [cse-ece-faculty] P&T decision, CJ- ALT, UT 6195-98	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
182.	EM Re Peer Teaching Evaluation, EN-CJ, UT6320-32	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
183.	EM [ece-faculty-a] student course-instructor surveys, YP-RY, P 3193-94	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
184.	EM Introducing Our New Assistant Dean of Diversity, Equity and Inclusion, SW-EN, P's Resp MSJ Ex 68		X	<ul style="list-style-type: none"> <li>No objection.</li> </ul>
185.	EM Re Peer Evaluations Overdue, SS-JE, TA, EN&BE, UT 26709-10	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
186.	EM Class: 1.518 : peer teaching evaluation EN-CJ, P 3139-51	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
187.	EM Peer Teaching Evaluation (Nikolova) BE- EN, P 3111-21		X	• No objection.
188.	Annual Reviews All 17-18, UT 18881	X		• No objection.
189.	Annual Reviews All 18-19, UT 0026307	X		• No objection.
190.	Nikolova FAR, UT 26228-34	X		• No objection.
191.	Gligoric FAR, 25176-79	X		• Relevance (Fed. R. Evid. 401).
192.	Soloviech FAR, 25223-25	X		• Relevance (Fed. R. Evid. 401).
193.	EM Re URGENT your FAR, CJ-DM, UT 26519		X	• No objection.
194.	EM Re [ECE Faculty Review] Rating Spreadsheet, CJ-DM, UT 26534-35	X		• No objection.
195.	EM Job Performance assessed by Faculty Evaluation Committee JE-EN, UT 8355	X		• No objection.
196.	EM Re Annual Review, assessed by Faculty Evaluation Committee and Department Chair, EN-DM, UT 35122-28	X		• No objection.
197.	EM Annual Review, assessed by Faculty Evaluation Committee EV-DM 7/27/20, P 3195-3205	X		• No objection.
<del>198.</del>	<del>EM RE Senior design supervision this semester, GS-SW, UT 25581-85 (Withdrawn)</del>			N/A.

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
<del>199.</del>	<del>EM RE Senior design supervision this semester, GS-AT, UT 25586-90 (Withdrawn)</del>			N/A.
200.	ECE Salaries 2013-20, Woods Depo Ex 11	X		• No objection.
201.	ECE Salaries 09-10 - 18-19 UT 26497		X	• No objection.
202.	ECE Salaries 19-20 UT 26498		X	• No objection.
203.	ECE Salaries 20-21 UT 26507		X	• No objection.
204.	EM Equity Raise Analysis GS-SW, UT 26434	X		• No objection.
205.	W-2 2013 A&M, P 1912		X	• Relevance (Fed. R. Evid. 401).
206.	W-2 2014 UT, P 1915-16		X	• No objection.
207.	W-2 2016 UT, P 1919-20		X	• No objection.
208.	W-2 2017 UT, P 1921-22		X	• No objection.
209.	W-2 2018 UT, P 1923		X	• No objection.
210.	W-2 2019 UT, P 1924		X	• No objection.
211.	FMLA Documentation, P 3556-59	X		• No objection.
212.	EM Re: Urgent: mental health, P 3560-63	X		• No objection.
213.	Job Search Documents, P 3577-3632		X	• No objection.
214.	EM Followup on MID Request JS-SW UT 7994-98	X		• No objection.
215.	Dalton Depo Notice		X	• Relevance (Fed. R. Evid. 401).
216.	Fenves Depo Notice		X	• Relevance (Fed. R. Evid. 401).

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
217.	Fenves Depo Notice First Amended		X	<ul style="list-style-type: none"> <li>Relevance (Fed. R. Evid. 401).</li> </ul>
218.	Fenves Depo Notice Second Amended		X	<ul style="list-style-type: none"> <li>Relevance (Fed. R. Evid. 401).</li> </ul>
219.	Wood Depo Notice		X	<ul style="list-style-type: none"> <li>Relevance (Fed. R. Evid. 401).</li> </ul>
220.	Spietel Depo Notice		X	<ul style="list-style-type: none"> <li>Relevance (Fed. R. Evid. 401).</li> </ul>
221.	Shockley Depo Notice		X	<ul style="list-style-type: none"> <li>Relevance (Fed. R. Evid. 401).</li> </ul>
222.	Dream Hard Essay EN, P 1939-57		X	<ul style="list-style-type: none"> <li>Relevance (Fed. R. Evid. 401).</li> </ul>
223.	Charge of Discrimination, P 1965-66 (Not for jury but for jurisdictional purposes)		X	<ul style="list-style-type: none"> <li>Relevance (Fed. R. Evid. 403).</li> <li>Confusing the issues (Fed. R. Evid. 403)</li> </ul>
224.	Right to Sue Letter, P 1963 (Not for jury but for jurisdictional purposes)		X	<ul style="list-style-type: none"> <li>Relevance (Fed. R. Evid. 403).</li> <li>Confusing the issues (Fed. R. Evid. 403).</li> </ul>
225.	<u>Gender Excel Spread Sheet UT 34032</u>	X		<ul style="list-style-type: none"> <li>Relevance (Fed. R. Evid. 403). In addition to Plaintiff indicating that she intends to drop her Equal Pay Act Claim, this spreadsheet includes only full Professors and Associate Professors—not Assistant Professors. As such, Dr. Nikolova does not appear in this data.</li> <li>In the alternative, Defendant invokes Rule 106. The spreadsheet (CSE v2 sorted.xlsx) is a working draft that was attached to an email (UT Austin_0034031), which provides critical context to understanding it. Defendant would ask Plaintiff to identify this spreadsheet as Exhibit 225-B and include the email as Exhibit 225-A and the second attachment as Exhibit 225-C.</li> </ul>

No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
226.	<u>Tenure Data Spreadsheet (Produced by UT11/10/20, no bates number)</u>	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
227.	<u>EM and Ltr, Letter in support of Eddie Nikolova, AK-GF 4/6/19, UT 8019-20</u>	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
228.	<u>Annual Reviews All ECE 14-15, UT 26195</u>	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
229.	<u>Annual Reviews All ECE 15-16 UT 26196</u>	X		<ul style="list-style-type: none"> <li>No objection.</li> </ul>
230.	<u>EM Faculty Request For Leave Form and attachments, P4714 - P4720</u>	X		<ul style="list-style-type: none"> <li>To the extent Plaintiff intends to offer page P4719-20, Defendant objects to the timeliness of the production, the inclusion of undisclosed medical opinion, and hearsay.</li> <li>However, by agreement between the Parties, Plaintiff has agreed <i>not</i> to offer pages P4719-20. As per that agreement, the version of Plaintiff's Exhibit 230 that has been submitted to the Court does <i>not</i> include those pages. Therefore, per that agreement, Defendant does not object to the version of Exhibit 230 that includes only P4714-18.</li> </ul>
231.	<u>EM FW Meeting with the dean order of discussion SS-SS 10/25/18, UT 6139-40</u>		X	<ul style="list-style-type: none"> <li>No objection.</li> </ul>
232.	<u>EM Chair s letter Nikolova sept 2018 v4docxAT-SW, 10/29/18 UT 7866</u>		X	<ul style="list-style-type: none"> <li>No objection.</li> </ul>
233.	<u>EM RE pregnancysick leave GS-SS, 5/24/18, UT 26161</u>		X	<ul style="list-style-type: none"> <li>No objection.</li> </ul>



No.	Description	Expect To Offer	May Offer	Defendant UT Austin's Objection(s) & Grounds
234.	<u>EM Items for todays discussion BE-JD, 5/21/19, UT 8833</u>		X	<ul style="list-style-type: none"> <li>• Relevance (Fed. R. Evid. 401).</li> <li>• Confusing the Issues, Wasting Time (Fed. R. Evid. 403).</li> </ul>
235.	<u>Sanghavi Dossier Full (Produced by Defendant without bates numbers on 3/17/21)</u>	X		<ul style="list-style-type: none"> <li>• Relevance (Fed. R. Evid. 401).</li> <li>• Unfair prejudice, confusing the issues (Fed. R. Evid. 403).</li> </ul> <p>Dr. Sanghavi's tenure case was not similarly situated to Dr. Nikolova's (e.g. different decision-maker, more than five year gap) and therefore Defendant objects to the dossier's admission into evidence.</p>

Respectfully submitted,

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**COUNSEL FOR UT AUSTIN**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 6, 2022, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Benjamin L. Dower

**BENJAMIN L. DOWER**

Deputy Chief for General Litigation Division